

MEMO ENDORSED**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**KEITH STANSELL, *et al.*,

Plaintiffs,

Case No. 1:25-cv-4181-VEC

v.

REVOLUTIONARY ARMED FORCES OF
COLOMBIA, *et al.*,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 7/2/25**PLAINTIFFS' NOTICE OF WITHDRAWAL OF
NOTICE OF MOTION ECF 5 AND MEMORANDUM OF LAW ECF 6**

Plaintiffs hereby notify the Court that in light of Judge Scola's June 25, 2025 Order, filed herein at ECF 11-1, Plaintiffs have decided to proceed in this district, and accordingly, withdraw today the Notice of Motion at ECF 5 and accompanying Memorandum of Law at ECF 6 (and Exhibits 6-1; 6-2), without prejudice.

Respectfully submitted this July 1, 2025.

/s/ Newton Porter
 Newton Porter, Esq.
 Tony Korvick, Esq.
 PORTER & KORVICK, P.A.
 4000 Ponce de Leon Blvd. Suite 470
 Coral Gables, FL 33146
 305-373-5040
 nporter@porterandkorvick.com
 tkorvick@porterandkorvick.com
Counsel for the Stansell Judgment Creditors
SDFL Local Counsel for the Pescatore Judgment Creditors

Application GRANTED.

7/2/25

SO ORDERED.

Valerie Caproni
 HON. VALERIE CAPRONI
 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I served this Memorandum by electronic mail to the following persons:

Steve Feigenbaum, Esq.
sfeigenbaum@braverlaw.net
BRAVERMAN GREENSPUN P.C.
110 East 42nd Street
New York, New York 10017
Counsel for JPMCB

Benedict Bernstein, Esq.
WHITE & CASE
701 Thirteenth Street N.W.
Washington, D.C. 20005
benedict.bernstein@whitecase.com
Counsel for Petrocedeno S.A. and PDVSA

Joseph Zumpano, Esq.
Leon N. Patricios
Zumpano Patricios, P.A.
312 Minorca Ave
Coral Gables, FL 33134
jzumpano@zplaw.com
lpatririos@zplaw.com
Counsel for Antonio Caballero

Jaime Guttman, Esq.
Scale Law Partners, LLC
777 Brickell Avenue, Suite 500
Miami, FL 33131
jaime@scale.law
Counsel for Osio Plaintiffs/Judgment Creditors

OFFICE OF FOREIGN ASSETS CONTROL
U.S. Department of the Treasury
1500 Pennsylvania Ave. NW
Washington DC
Via email to OFACReport@treasury.gov, in compliance with 31 CFR 501.605(A)(3)

None of the defendants have appeared and defaults were properly entered against them all prior to entry of the Default Judgment. Accordingly, no further notice, service of pleadings, motions or writs is required to be served on Defendants. Fed. R. Civ. P. 5(a)(2).

/s/ Newton Porter

Newton Porter, Esq.

Tony Korvick, Esq.

PORTER & KORVICK, P.A.

4000 Ponce de Leon Blvd. Suite 470

Coral Gables, FL 33146

305-373-5040

nporter@porterandkorvick.com

tkorvick@porterandkorvick.com

Counsel for the Stansell Judgment Creditors

SDFL Local Counsel for the Pescatore Judgment

Creditors